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**Attorneys for Defendants**  
**Tee Vee Brands USA, Tee Vee Brands International, Ltd.,**  
**and Vin Advani**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

-----X **2:10-cv-03730 (SRC)(MAS)**  
**TELEBRANDS CORP.**

**Plaintiff,**

**v.**

**TEE VEE BRANDS (USA), TEE VEE**  
**BRANDS INTERNATIONAL, LTD.**  
**TELEMARKETERS, INC., VIN ADVANI,**  
**ORIGINAL TV PRODUCTS, INC. and**  
**YASIR ABDUL.**

**DECLARATION OF ARIEL**  
**PEIKES IN SUPPORT OF**  
**DEFENDANTS' MOTION TO**  
**SEAL**

**Defendants.**

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**I, ARIEL S. PEIKES, of full age, hereby certifies as follows:**

1. I am an attorney at law of the State of New Jersey, where I am a member in good standing of the bar. I am an associate of the firm Gottlieb, Rackman & Reisman, P.C., counsel for the Defendants Tee Vee Brands (USA), Tee Vee Brands International, Ltd. and Vin Advani (hereinafter "TVB"). I have personal knowledge of the facts set forth herein.

2. The materials that TVB seeks to seal include references to the parties Confidential Settlement Agreement dated February 11, 2011.

3. The Agreement and its terms were designated "Confidential" by all parties, and such Agreement is covered by the Protective Order executed by the parties, and entered in this action on September 24, 2012.

4. I make this Declaration based upon my knowledge in support of the Motion to Seal Materials. Sealing is sought for the following documents:

a. Letter of Richard S. Schurin to Hon. Stanley R. Chesler dated July 16, 2012, and its enclosures.


5. This action involves confidential information that the parties have a legitimate interest in protecting as confidential because its competitors in the marketplace could utilize the information to gain an unfair advantage to the detriment of the parties.

6. The interest of the public that is believed to warrant the granting of this motion is the interest of promoting settlement of disputes.

7. It is believed that the clearly defined and serious injury that would result should the motion not be granted is that alleged valuable information would be disclosed.

8. It is believed that no less restrictive alternative is available to prevent the defined and serious injury to the parties.

9. I certify under penalty of perjury that the foregoing is true and correct.

  
Ariel S. Peikes

Dated: July 16, 2012